IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: ASBESTOS PRODUCTS LIABILITY LITIGATION

MDL DOCKET NO. 875

ROBERT E. BELUE, et al., vs. ASBESTOS DEFENDANTS: A.O. SMITH ELECTRICAL PRODUCTS, et. al.

IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF ALABAMA

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Plaintiffs,

vs. CIVIL ACTION NO. 2:06-CV-1034-WKW ASBESTOS DEFENDANTS:

Defendants.	
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A.O. SMITH ELECTRICAL PRODUCTS, et al.,

JOINDER AND ADOPTION IN MOTION TO DISMISS, OR IN THE ALTERNATIVE, MOTION TO SEVER AND FOR MORE DEFINITE STATEMENT

COME NOW Defendants Union Carbide Corporation, Foseco, Inc., and Maremont Corporation and hereby join in and adopt as though fully set forth Motion to Dismiss, or in the Alternative, Motion to Sever and for More Definite Statement filed by Sunbeam Products Incorporated herein on May 16, 2008.

WHEREFORE, for all the arguments, citations to authority and for all other grounds the court deems applicable, Defendants Union Carbide Corporation, Foseco, Inc., and Maremont Corporation respectfully request this Honorable Court to grant Motion to Dismiss, or in the Alternative, Motion to Sever and for More Definite Statement filed by Sunbeam Products

Incorporated herein and to further grant all additional relief this Honorable Court deems necessary and proper.

Document 262

Respectfully submitted this 23rd day of May, 2008.

HAWKINS & PARNELL, LLP

/s/ Evelyn M. Fletcher Evelyn M. Fletcher (FLE 019) AL Bar No. ASB-1485-C19E Elizabeth B. Padgett (PAD015) Alabama Bar No. ASB-3936-C60P

Counsel for Foseco, Inc., Maremont Corporation, and Union Carbide Corporation

4000 SunTrust Plaza 303 Peachtree Street, N.E. Atlanta, GA 30308-3243 404/614-7400

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this date served the foregoing on all counsel by electronic filing and served Plaintiffs' counsel at the following address by U. S. Mail, with proper postage affixed:

G. Patterson Keahey, Jr. Law Offices of G. Patterson Keahey, P.C. One Independence Plaza, Suite 612 Birmingham, AL 35209

This 23rd day of May, 2008.

HAWKINS & PARNELL, LLP

/s/ Evelyn M. Fletcher Evelyn M. Fletcher (FLE019) AL Bar No. ASB-1485-C19E Elizabeth B. Padgett (PAD 015) Alabama Bar No. ASB-3936-C60P

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Counsel for Foseco, Inc., Maremont Corporation, and Union Carbide Corporation

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